Eric Fryson

From:

Keating, Beth [BKeating@gunster.com]

Sent:

Monday, October 08, 2012 11:50 AM

To:

Filings@psc.state.fl.us

Cc:

'Martin, Cheryl'; 'Brian Sulmonetti'; 'Elizabeth Wade'; 'Carolyn Bermudez'; 'Ansley Watson, Jr.'; Jennifer Crawford; 'Paula K. Brown'; 'jcuebas@tecoenergy.com'; 'sshoaf@stjoenaturalgas.com';

'Christensen, Patty'; Michael Lawson

Subject:

Docket No. 120003-GU

Attachments: 20121008113819248.pdf; Prehearing Statement PGA 2012.DOC

Attached for electronic filing, please find the Prehearing Statement of Florida City Gas. Also attached is a copy in native format.

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe St., Suite 601 Tallahassee, FL 32301 bkeating@gunster.com
Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe St., Suite 601 Tallahassee, FL 32301 bkeating@gunster.com

Direct Line: (850) 521-1706

- b. Docket No. 120003-GU In re: Purchased Gas Adjustment (PGA) True-Up.
- c. On behalf of: Florida City Gas
- d. There are a total of pages: PDF file: 5 pages.

Word File: 4 pages.

e. Description: Prehearing Statement



Beth Keating | Attorney Governmental Affairs 215 S. Monroe Street, Suite 601 Tallahassee, FL 32301 P 850-521-1706 C 850-591-9228 gunster.com | <u>View my bio</u>

MAT WILLIAM PAGE

we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.

http://www.gunster.com/terms-of-use/



Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

October 8, 2012

Electronic Filing - filings@psc.state.fl.us

Ms. Ann Cole Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 120003-GU-Purchased Gas Adjustment (PGA) True-Up.

Dear Ms. Cole:

Attached for electronic filing, please find the Prehearing Statement of Florida City Gas. Also attached, please find a copy of the filing in native format.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

MEK

cc: Parties of Record

DOCUMENT NUMBER-DATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Purchased Gas Adjustment |) | Docket No. 120003-GU |
|---------------------------------|----------|------------------------|
| (PGA) True-up |) | |
| | <u> </u> | Filed: October 8, 2012 |

FLORIDA CITY GAS COMPANY'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure, Order No. PSC-12-00079-PCO-GU, Florida City Gas hereby submits its Prehearing Statement.

A. Known Witnesses

Florida City Gas intends to offer the 2011 true-up testimony of Thomas Kaufmann, as on April 25, 2012, as well as the true-up factor testimony of Mr. Kaufmann, as September 12, 2012.

Thomas Kaufmann

Issues 1-5

B. Known Exhibits

Florida City Gas intends to sponsor the following exhibits:

Kaufmann

TK-1

Final Fuel Over/Under Recovery (Schedule A-

7)

TK-2

Schedules E-1 Winter, E-1, E-1/R, E-2,

E-3, E-4, E-5

C. Basic Position

Florida City Gas has appropriately calculated its true-up amounts and purchased gas adjustment factor as shown in the Company's positions on Issues 1-5.

D. – F. Issues

Florida City Gas' position on the issues identified by Staff are as follows:

Issue 1:

What are the final purchased gas adjustment true-up amounts for the period January 2011 through December 2011?

BOOUMENT NUMBER - DATE

06814 OCT-8≌

Docket No. 120003-GU

Page 2

Florida City Gas: An over-recovery of \$1,905,623.

<u>Issue 2:</u> What are the actual/estimated purchased gas adjustment true-up

amounts for the period January 2012 through December 2012?

Florida City Gas: An under-recovery of \$2,194,043.

<u>Issue 3:</u> What are the total purchased gas adjustment true-up amounts to be

collected during the period January 2013 through December 2013?

Florida City Gas: An under-recovery of \$288,420 for a true-up refund factor of 0.688

cents per therm.

<u>Issue 4:</u> What are the appropriate levelized purchased gas cost recovery

(cap) factors for the period January 2013 through December 2013?

Florida City Gas: Based on the winter months of October through March the

appropriate (cap) factors are, 76.009 cents per therm (before the regulatory assessment fee) or 76.392 cents per therm (with the

regulatory assessment fee).

Issue 5: What should be the effective date of the new purchased gas

adjustment charge for billing purposes?

Florida City Gas: The factors should be effective for all meter readings on or after

January 1, 2013 and should apply for bills rendered for meter readings taken between January 1, 2013 and December 31, 2013.

G. Stipulated Issues

Florida City Gas is not a party to any stipulations at this time, although it believes that it should be possible to reach a stipulation on each of the above issues as they relate to Florida City Gas.

H. Pending Motions

None at this time.

I. Pending Confidentiality Requests

Request for Extension of Confidentiality submitted April 25, 2012.

Docket No. 120003-GU Page 3

J. <u>Compliance With Order on Procedure</u>

Florida City Gas believes that this Prehearing Statement fully complies with the requirements of the Order on Procedure.

K. Objections to Witness Qualifications

Florida City Gas has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 8th day of October, 2012.

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by US Mail to the following parties of record this 8th day of October, 2012:

| Florida Public Utilities Company Cheryl Martin 1641 Worthington Road, Suite 220 West Palm Beach, FL 33409-6703 | MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531 |
|---|--|
| Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 | Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 |
| Peoples Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111 | St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549 |
| TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111 | AGL Resources Inc. Elizabeth Wade/Brian Sulmonetti Ten Peachtree Place Location 1470 Atlanta, GA 30309 |
| Florida City Gas Carolyn Bermudez 933 East 25 th Street Hialeah, FL 33013-3498 | · |

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706